



September 2, 2005

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington D.C. 20554

RE: WT Docket 05-196

Spokane County, Washington is located in the Northeast quadrant of Washington State, adjacent to the State of Idaho. Spokane County 911 provides service to a population of 475,000 countywide.

Spokane County 9-1-1 serves a diverse geographical area, in portions of the county today there is no wireless coverage, let alone opportunity for more advanced options for communications (such as VOIP). The demographics of the county include cultural and economic diversity, urban and rural communities, and agrarian, technological and medical industries.

Spokane County supports the FCC's ruling to require interconnected VOIP providers ensure they are able to deliver accurate location and call back information to the PSAP when their customer dials 9-1-1. The provision of 9-1-1 service is not optional; the public has a reasonable expectation that 9-1-1 service with accurate location and call back information will be provided to the 9-1-1 call receiver.

Spokane County has received calls from citizens on IP phones, many of whom have been frustrated with the lack of information displayed to the call receiver.

Public safety enhancements enabling the 9-1-1 community to respond to NG9-1-1 involve innovations that require technical resolution of technical

issues, coordination between 9-1-1 professionals and industry and the development of reliable, sustainable funding for PSAPs. The solution at the PSAP level is not as simple as plugging in an IP phone with display capabilities. Spokane County 9-1-1 intends to be actively involved in the 9-1-1 response to NG9-1-1.

Reliable, sustainable funding for PSAP operations is essential nationwide to accomplish basic services, let alone infrastructure upgrades and replacement. In Spokane County there is no general fund money at the municipal or county level to support operations or equipment replacement.

Spokane County, Washington, is asking the FCC not to extend the 120-day deadline for interconnected VOIP to provide enhanced 9-1-1 services to their customers. Since 9-1-1 is the nation's universal number for access to emergency services, all citizens deserve the security of enhanced 911 services.

Spokane County requests that FCC requirements imposed on VOIP not cause an undue burden to the nation's PSAPs to process and dispatch emergency responses to 9-1-1 calls. While it is critical that the 911 industry respond to new technologies, 911 services throughout the nation are not ubiquitous. Spokane County asks that the FCC rules consider the technical and operational requirements of the current PSAP infrastructure and should not impose rules that will require unfunded upgrades or wholesale replacement of PSAP equipment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lorlee J. Mizell".

Lorlee J. Mizell, Director

CC: Spokane County Board of Commissioners  
Spokane County Emergency Services Communication Board  
Yucel Ors, Director of Legislative Affairs, APCO International

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